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September 2, 1997

HAND DELIVERY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: **Universal Service Generic Contested Case**
Docket No. 97-00888

Dear Mr. Waddell:

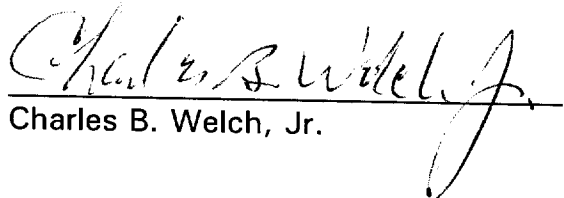
Enclosed for filing are the original and thirteen copies of the Reply Comments of Time Warner Communications of the Mid-South's, L.P. to the Hearing Officer's Notice of Proposed Schedule and Request for Comments in the above referenced case.

Copies are being served on all parties to this proceeding.

Very truly yours,

FARRIS, MATHEWS, GILMAN, BRANAN & HELLEN, P.L.C.

By:


Charles B. Welch, Jr.

CBW,jr:cg

c:welch:timewarn:letters:waddell.902

cc: Carolyn M. Marek
All Parties of Record

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

SEP 2 AM 11 20

In Re:

Universal Service Generic
Contested Case

SECRETARY

Docket No.
97-00888

REPLY COMMENTS OF TIME WARNER COMMUNICATIONS
OF THE MID-SOUTH, L. P. TO HEARING OFFICER'S NOTICE
OF PROPOSED SCHEDULE AND REQUEST FOR COMMENTS

Time Warner Communications of the Mid-South, L.P. ("Time Warner"), files its reply comments and suggestions to the Hearing Officer's Notice of Proposed Schedule and Request for Comments, as follows:

I. Scheduling.

In consideration of the FCC's February 6, 1998, deadline for filing of state specific cost studies, Time Warner suggests that the cost study phase of this hearing be accelerated and a cost study be developed and adopted by the TRA before considering the issues in the non-costing phase of the proceeding which will probably not require final determination until late 1998. After reviewing the comments filed by the parties on August 22, 1997, Time Warner submits that the proposed schedule submitted by United Telephone-Southeast, Inc. ("Sprint") would be appropriate and recommends that the TRA adopt Sprint's schedules for these proceedings.

II. Substantive Issues.

An analysis of the comments filed by the parties to this proceeding indicates that there is considerable consistency in their positions, especially on the non-costing issues. It would appear that many issues could be resolved by agreement and without the necessity of a formal hearing. Time Warner suggests that an informal mediation or settlement conference be conducted for this purpose. Time Warner is of the opinion it would be appropriate for one or all of the directors to serve as mediator(s)/hearing officer(s) and that such an informal hearing would resolve many issues and narrow the scope of the remaining contested issues. If successful, this mediation or settlement conference could save significant time and expense and

produce much more comprehensive and practical results.

Respectfully submitted,

FARRIS, MATHEWS, GILMAN,
BRANAN & HELLEN, P.L.C.

By: Charles B. Welch, Jr.
Charles B. Welch, Jr. - BPR #005539
Attorney for Time Warner Communications
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Comments of Time Warner Communications of the Mid-South, L.P., on all counsel for the parties of record by placing a copy of same in the United States Mail, properly addressed and postage prepaid on this the 2nd day of September, 1997.

Charles B. Welch, Jr.
Charles B. Welch, Jr.